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11 Attorneys for Plaintiff
12 United States of America
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15 IN THE UNITED STATES DISTRICT COURT
16
17 EASTERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 STEPHAN JAMES EVANOVICH,
22 JONATHAN CURL, and
23 ANDREA CARTER

24 Defendants.

25 CASE NO. 2:24-CR-0079-TLN

26 STIPULATION REGARDING EXCLUDABLE
27 TIME PERIODS UNDER SPEEDY TRIAL ACT;
28 FINDINGS AND ORDER

DATE: November 7, 2024

TIME: 9:30 a.m.

COURT: Hon. Troy L. Nunley

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b) As of the last court filing, the government has continued its investigation, resulting in the execution of an additional arrest warrant, corresponding additional discovery, and the receipt of additional grand jury subpoena returns, all of which have been produced to the defense. Over 390 pages of new discovery were produced to the defense. In addition, over 200 pages of discovery that were still processing at the time of the last court filing have since been fully processed and provided to the defense.

c) Since the last court filing, Defendant Andrea Carter was arrested in connection with this case. Her counsel has been provided with the government's discovery in the case, consisting of over 14,000 pages.

d) Counsel for defendants Evanovich, Curl, and Carter desire additional time to review discovery, research the charges and potential defenses, conduct independent investigation, and consult with their clients.

e) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

f) The government does not object to the continuance.

g) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of November 7, 2024 to January 23, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

1 //

2 IT IS SO STIPULATED.

3 Dated: November 4, 2024

4 PHILLIP A. TALBERT
5 United States Attorney

6 /s/ JESSICA DELANEY
7 JESSICA DELANEY
8 Assistant United States Attorney

9 Dated: November 4, 2024

10 /s/ CHRISTINA SINHA
11 CHRISTINA SINHA
12 Counsel for Defendant
13 Stephan James Evanovich

14 Dated: November 4, 2024

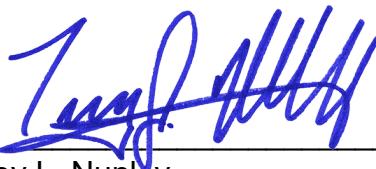
15 /s/ KELLAN PATTERSON
16 KELLAN PATTERSON
17 Counsel for Defendant
18 Jonathan Curl

19 Dated: November 4, 2024

20 /s/ CHRIS COSCA
21 CHRIS COSCA
22 Counsel for Defendant
23 Andrea Carter

24 **ORDER**

25 IT IS SO FOUND AND ORDERED this 4th day of November, 2024.

26
27
28 
29 Troy L. Nunley
30 Chief United States District Judge